

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN**

In Re:

RACHEL E. GULLICKSRUD,

Debtor.

**BREMER BANK, N.A.'S
OBJECTION TO DEBTOR'S
MOTION TO EXTEND TIME TO
FILE THE MOTION ON
VALUATION**

Case No. 16-11860

NOW COMES Bremer Bank, N.A., by and through its attorneys, Bakke Norman, S.C., by Deanne M. Koll, who objects to Debtor's request to extend the time to file a Motion on Valuation as follows:

1. Debtor filed this bankruptcy matter on May 25, 2016.
2. At the time the bankruptcy matter was filed, secured creditors Bremer Bank, N.A. ("Creditor") as well as First National Bank of Waupaca had commenced replevin actions based upon Debtor's default on loans with each financial institution.
3. Debtor shares bankruptcy counsel with her parents, Dan and Lori Gullicksrud.
4. Dan and Lori Gullicksrud's 341 Hearing was held on June 7, 2016.
5. If Debtor was not previously aware of the comingling and valuation issues at hand, Debtor's counsel became aware of this issue at Dan and Lori Gullicksrud's 341 Hearing on June 7, 2016, based upon the questions raised and answers provided at that 341 Hearing.
6. That gave Debtor approximately four (4) weeks to compile a plan to value her collateral at issue.
7. Debtor does not allege that there were any intervening circumstances within that 4 week time period which prohibited Debtor from obtaining appropriate valuations, except for the surgery one (1) day before the deadline.

8. It was imprudent to wait until the day before the deadline to attempt to compile the valuation, as alleged in the Motion for Extension.

9. Additionally, Debtor may improperly use the current Motion for Extension as a shield to defend against Creditor's currently pending Motion for Relief from Stay.

WHEREFORE, Creditor respectfully requests that the Court deny Debtor's Motion to Extend the Time to File the Motion on Valuation.

Dated: July 12, 2016

BAKKE NORMAN, S.C.

By: /s/ Deanne M. Koll
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